

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

CIVIL ACTION NO: 2:16-CV-00488-GZS

U.S. Bank Trust, N.A., as Trustee for  
LSF9 Master Participation Trust

Plaintiff

vs.

Louise L. Nunn and Timothy A. Nunn

Defendants

PLAINTIFF'S REQUEST FOR ENTRY  
OF DEFAULT AS TO LOUISE L. NUNN  
AND TIMOTHY A. NUNN

RE:  
22 Dawes Avenue, Auburn, ME 04210

Mortgage:  
06/08/2005  
Book 6364, Page 156

NOW COMES the Plaintiff, U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation Trust (hereinafter "U.S. Bank"), pursuant to Fed.R.Civ. P.55(a) and hereby moves for Default, following service, as to Parties Louise L. Nunn and Timothy A. Nunn since said Parties have neither answered nor otherwise appeared in this matter. As grounds therefore, Plaintiff states the following:

1. Plaintiff's Complaint was filed on September 23, 2016.
2. The Borrower, Louise L. Nunn, was served with the subject complaint on September 27, 2016.
3. As of this date, Borrower Louise L. Nunn has neither answered nor otherwise appeared in this matter.
4. The Borrower, Timothy A. Nunn, was served with the subject complaint on September 27, 2016.

5. As of this date, Borrower Timothy A. Nunn has neither answered nor otherwise appeared in this matter.
6. Proofs of Service for all parties were filed on October 21, 2016.
7. The said Parties are not in the military.
8. Plaintiff has brought this action to address six counts entitling it to various forms of relief including Foreclosure, Breach of Note, Breach of Contract, Money Had and Received, Quantum Meruit, and Unjust Enrichment.
9. By failing to appear in this matter, entry of default in favor of Plaintiff, pursuant to Fed.R.Civ.P Rule 55(a) is proper against Parties Louise L. Nunn and Timothy A. Nunn.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter default as against to Defendants, Louise L. Nunn and Timothy A. Nunn.

DATED: January 13, 2017

/s/John A. Doonan, Esq.  
John A. Doonan, Esq., Bar No.: 3250  
Attorney for Plaintiff  
Doonan, Graves & Longoria, LLC  
100 Cummings Center  
Suite 225D  
Beverly, MA 01915

**CERTIFICATE OF SERVICE**

I, John A. Doonan, Esq. hereby certify that on January 13, 2017 I served a copy of the above document by electronic notification using the CM/ECF system and/or First Class Mail to the following:

/s/John A. Doonan, Esq.  
John A. Doonan, Esq., Bar No.: 3250

Louise L. Nunn  
22 Dawes Avenue  
Auburn, ME 04210

Timothy A. Nunn  
22 Dawes Avenue  
Auburn, ME 04210